Sulfur Hexafluoride: The Good, the Bad & the Future

Managing a Mission-critical Greenhouse Gas

SULFUR HEXAFLUORIDE (SF₆)

is a gas used by the Navy in many tactical systems, from shipboard targeting radar to torpedo propulsion systems and underwater warfare acoustic countermeasures. Unfortunately, SF₆ is also a potent greenhouse gas (GHG) —more than 22,800 times more potent than carbon dioxide. Because SF₆ is non-flammable, nontoxic and a strong dielectric (providing excellent electrical insulation), it is a critical material in a host of Navy applications including the MK 50 torpedo, electric switchgear on shoreside power facilities, submarine countermeasures and mine hunting and in radar domes.

Clearly, proactive management and control of SF₆ emissions will be needed to sustain mission capability while complying with emerging GHG reduction policies and regulations. As the debate continues on how to best regulate GHGs, several key Department of Defense (DoD) offices collaborated to assess the risks related to DoD's use of SF₆ and identify risk management actions.

In November 2007, the Clean Air Act Services Steering Committee

(CAASSC)—which addresses military issues relevant to the Clean Air Act (CAA)—and staff from the Office of the Secretary of Defense's (OSD) **Emerging Contaminants Program** discussed the possibility of conducting an assessment related to the evolving regulatory climate surrounding SF₆. The Emerging Contaminants Program, part of OSD's Chemical and Material Risk Management Directorate (CMRMD), identifies, assesses and takes steps to manage the impacts posed by emerging contaminants (EC) on major DoD functional areas before regulations take effect. The program uses a "scan-watch-action" process for "looking over the horizon" to identify and assess ECs. This collaborative assessment prompted the development of Risk Management Options

(RMO) and a recommendation that SF_6 be elevated to CMRMD's high priority "Action List" for ECs.

The DoD's assessment found that 22 states had GHG emission targets. Most significantly, the California Air Resources Board has proposed a phase-out of all uses of SF₆ in 2013. In this instance, the CMRMD, Air Force and the DoD Regional Environmental Coordinator teamed up to secure an extension until 2020 for critical uses of SF₆ as a tracer gas to trace leaks in tanks and pipelines.

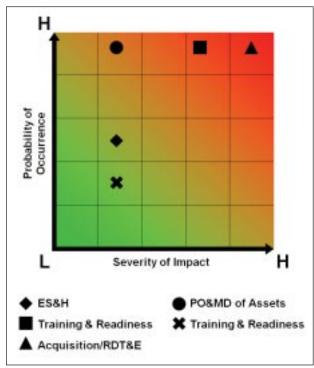
SF₆ is also monitored under the United Nations Framework for Climate Convention (UNFCC) and the Intergovernmental Panel on Climate Change. After the United States Supreme Court in April 2007 deter-

SF₆ in the Atmosphere

AVERAGE GLOBAL SF $_6$ concentrations increased by about seven percent per year during the 1980s and 1990s, mostly as the result of its use in the magnesium production industry, and by electrical utilities and electronics manufacturers. Given the low amounts of SF $_6$ released compared to carbon dioxide, its overall contribution to global warming is estimated to be less than 0.2 percent.



mined that GHGs are air pollutants under the CAA, the U.S. Environmental Protection Agency issued a proposed "endangerment" finding for GHGs under Section 202(a) of the CAA. These developments, in combination with a



Summary of impact assessment of SF₆ on DoD functional areas.

recent U.S. House of Representatives energy bill identifying SF₆ as a GHG, led to CMRMD's conclusion that restrictions, reductions in availability, higher costs and producer phase-outs are the likely results of potential GHG regulations. The graph below summarizes the first phase of the SF₆ assessment and displays which DoD functional areas are most likely to be affected by expected changes in the management of SF₆ risks.

The potential risks and impacts to DoD functions were identified through the input of subject matter experts. On the graph shown below, high risks to DoD are in the upper right, while lower risks are located in the lower left. Possible SF₆ regulations (i.e., a proposed GHG regulatory scheme) would pose high risks to both Acquisition, Research, Development, Testing and Evaluation (Acquisition/RDT&E) and Training and Readiness. Regulation of SF₆ would pose little to moderate risk in other DoD functional areas, such as Production, Operations & Maintenance and Disposal (PO&MD), and Environment, Safety & Health (ES&H). The results of the assessment were so striking that SF₆ was elevated to the CMRMD's "Action List" and development of RMOs was accelerated. As a result of the assessment, some risk management actions were initiated immediately. For example, the Strategic Environmental Research and Development Program issued a Statement of Need for research on substitutes in November 2008.



Navy personnel launch a torpedo powered by SF₆ among other constituents. Mass Communication Specialist Seaman Leah Allen

The assessment and draft RMOs were completed by CMRMD in June of 2009.

The RMOs include:

- Expanding research and development for substitutes for SF₆ in DoD applications,
- Developing a mandatory DoD policy for leak detection, capture and reuse,
- Leveraging research and development being performed by the Electric Power Research Institute regarding substitutes for use in electrical infrastructure, and
- Evaluating the feasibility and cost of stockpiling SF₆ for critical uses.

The fact that DoD would need a baseline for SF₆, and means to reduce its use, was underscored on 5 October 2009 when President Obama issued Executive Order (EO) 13514, Federal Leadership in Environmental, Energy and Economic Performance. Aimed at making broad improvements in the sustainability of the federal government, the EO requires all federal agencies inventory their GHGs and set targets to reduce their emissions by 2020.

The SF₆ RMOs were endorsed for implementation by the executive-level EC Governance Council at its annual meeting on 13 October 2009.

Conclusion

The military services have many critical uses for SF₆, and awareness is growing that the gas is a potent global warmer for which cost increases and restrictions are on the horizon. The collaboration between the CAASSC and CMRMD resulted in an expedited and thorough assessment of the risks and the development of RMOs to manage the risks. However, as there are currently no suitable SF₆ substitutes for most mili-

tary operations, finding, testing, and qualifying substitutes may be a long-term effort. All of these factors point to the need for a well-organized plan for minimizing releases until substitutes are developed, tested and deployed. \$\mathcal{J}\$

CONTACTS

Steven Gibb Noblis, Inc. 703-610-2441 steve.gibb@noblis.org

Paul Yaroschak
Office of the Secretary of Defense—
Acquisition, Technology & Logistics
(Installations & Environment)
703-604-0641
DSN: 664-0641
paul.yaroschak@osd.mil

Elmer Ransom Environmental Management Staff, Commandant of the Marine Corps 703-695-8302 DSN: 225-8302 elmer.ransom@usmc.mil